

DAVID JENSEN PLLC

BEACON ♦ MANHATTAN

33 HENRY STREET
BEACON, NEW YORK 12508

111 JOHN STREET, SUITE 420
NEW YORK, NEW YORK 10038

23 December 2022

Hon. Renée Marie Bumb
United States District Court
4th & Cooper Streets
Camden, New Jersey 08101
Submitted by CM/ECF

Re: *Koons, et al. v. Reynolds, et al.*
No. 1:22-cv-07464-RMB-EAP

Dear Judge Bumb:

I represent the Plaintiffs in the above-captioned action, which challenges a newly enacted law that severely restricts the places where individuals can carry handguns, notwithstanding that they have qualified for and obtained permits to carry handguns under New Jersey law. *See* 2022 N.J. Laws c. 131, § 7(a)-(b). These restrictions directly contravene the Supreme Court's decision in *New York State Rifle & Pistol Ass'n v. Bruen*, 597 U.S. ___, 142 S. Ct. 2111 (2022). Moreover, these restrictions are effective immediately. *See* 2022 N.J. Laws c. 131, § 12.

I write to advise the Court that Plaintiffs intend to file a motion for a temporary restraining order and a preliminary injunction. While we would have preferred to have waited until after the holiday, the restrictions are (as stated) effective immediately. We are submitting this letter in the hope that it will expedite the scheduling of this matter for resolution. We have included representatives of the various Defendants in copy, and we will send copies of the motion papers to them by e-mail/fax and (if necessary) by overnight courier.

We propose that Defendants submit their opposition papers by Thursday, December 29, 2022, and that Plaintiffs submit their reply papers by Tuesday, January 3, 2023, without oral argument to be scheduled thereafter.

Respectfully submitted,

DAVID JENSEN PLLC



David D. Jensen

DAVID JENSEN PLLC

ATTORNEY AND COUNSELOR AT LAW
NEW YORK PROFESSIONAL LIMITED LIABILITY COMPANY
ADMITTED TO PRACTICE IN NEW JERSEY AND NEW YORK

+ 1.212.380.6615 TEL
+ 1.917.591.1318 FAX
david@djensenpllc.com

DAVID JENSEN PLLC

cc: Stuart M. Feinblatt
Assistant Attorney General
Office of the New Jersey Attorney General
Sent by E-Mail

Bryan Lucas
Deputy Attorney General
Office of the New Jersey Attorney General
Sent by E-Mail

William Reynolds
Atlantic County Prosecutor's Office
Sent by E-Mail

Grace A. MacAulay
Camden County Prosecutor's Office
Sent by E-Mail

Annemarie Taggart
Sussex County Prosecutor's Office
Sent by Fax to (973) 383-4929